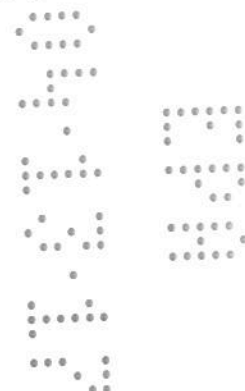




Tammy Tyler
Regulatory Product Manager
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L0001780



VIA FEDEX

April 12, 2017

Document Processing Desk [6(a)(2)]
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Document Processing Room – S-4900
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2777 S. Crystal Drive
Arlington, VA 22202

**SUBJECT: SUBMISSION UNDER FIFRA SECTION 6(a)(2) CONCERNING THE
ACTIVE INGREDIENT TRINEXAPAC-ETHYL,
EPA REGISTRATION No. 100-727**

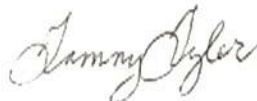
In accordance with EPA's current interpretation of the reporting requirements of Section 6(a)(2) of FIFRA, Syngenta Crop Protection, LLC wishes to bring to your attention information from the study "*Trinexapac-Ethyl – Growth Inhibition of the Aquatic Macrophyte Myriophyllum spicatum in a Water-Sediment System*". This study was completed in support of the European AIR3 re-evaluation.

As part of the EU AIR inclusion of TXP (trinexapac-ethyl), the Rapporteur Member State requested an OECD 239 rooted macrophyte study to fulfil the new data-requirement. This is not a standard test and the method is not required by US EPA. Nevertheless, the *Myriophyllum* endpoint resulted in a lower endpoint in comparison with the existing *Lemna* study as shown below.

Organism group	Test organism	Endpoint (µg/L)
Aquatic macrophyte	<i>Lemna gibba</i> Grade (2001) - CGA163935/708	7 d E _b C ₅₀ = 8 800
Aquatic macrophyte	Eurasian watermilfoil <i>Myriophyllum spicatum</i>	14 d E _y C ₅₀ = 200

This study has already been submitted in the EU as part of the re-evaluation process. Please contact me by email (tammy.tyler@syngenta.com) or call me at 336-632-6055 if you have any questions regarding this submission.

Sincerely,

A handwritten signature in cursive script that reads "Tammy Tyler".

Tammy Tyler
Regulatory Product Manager
Regulatory Affairs
Syngenta Crop Protection, LLC

